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11 *Attorneys for Defendant*
12 *Midland Credit Management, Inc.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 MIA L. RAMOS, an individual,

16 Case No. 2:20-cv-01356-RFB-BNW

17 Plaintiff,

18 **STIPULATION AND ORDER TO EXTEND**
TIME TO ANSWER COMPLAINT

19 v.

20 **(FIRST REQUEST)**

21 MIDLAND CREDIT MANAGEMENT,
22 INC., a foreign corporation;

23 Complaint filed: July 23, 2020

24 Defendant.

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19 Defendant Midland Credit Management, Inc. (“Midland”) and Plaintiff Mia L. Ramos
20 (“Plaintiff”), by and through their respective counsel of record, hereby submit this stipulation to
21 extend the time for Midland to respond to Plaintiff’s Complaint (ECF No. 1) pursuant to LR IA 6-
22 1.
23

24 Plaintiff filed her Complaint on July 23, 2020. (ECF No. 1). The current deadline for
25 Midland to respond to the Complaint is August 18, 2020. Plaintiff and Midland stipulate and agree
26 that Midland shall have until September 1, 2020 to file its responsive pleading.

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1 This is Midland's first request for an extension of time to respond to the Complaint and is
2 not intended to cause any delay or prejudice any party, but due to Midland's counsel recently being
3 retained and to provide an opportunity to review the allegations in the Complaint.

4 **IT IS SO STIPULATED.**

5
6 DATED this 18th day of August 2020.

NAYLOR & BRASTER

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8 By: /s/ John M. Naylor

9 John M. Naylor (NBN 5435)
10 Andrew J. Sharples (NBN 12866)
11 1050 Indigo Drive, Suite 200
12 Las Vegas, NV 89145

13 *Attorneys for Defendant
14 Midland Credit Management, Inc.*

15 DATED this 18th day of August 2020.

LAW OFFICE OF KEVIN L. HERNANDEZ

16 By: /s/ Kevin L. Hernandez

17 Kevin L. Hernandez (NBN 12594)
18 8872 S. Eastern Avenue, Suite 270
19 Las Vegas, Nevada 89123

20 *Attorney for Plaintiff Mia L. Ramos*

21 **IT IS SO ORDERED.**

22 Dated this 20th day of August 2020.


UNITED STATES MAGISTRATE JUDGE